

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
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PRUDENTIAL EQUITY GROUP, LLC,

DISCLOSURE

PURSUANT

Plaintiff,

TO F.R.C.P. 26(a)(3) FOR  
MARTIN N. KROLL  
AND KROLL, MOSS &  
KROLL, LLP

- against -

THOMAS R. AJAMIE, AJAMIE LLP, ROBERT  
WEISS, ROBERT H. WEISS & ASSOCIATES, LLP,  
JOHN MOSCOW, ROSNER NAPIERALA, LLP,  
BRIAN ROSNER, DAVID ROBBINS, KAUFMANN  
FEINDER YAMIN GILDIN & ROBBINS, LLP,  
WALLACE SHOWMAN, BERNSTEIN LITOWITZ  
BERGER & GROSSMAN LLP, ROBERT KRAUS,  
KRAUS & ZUCHLEWSKI LLP, MARTIN KROLL,  
KROLL, MOSS & KROLL, LLP, JOHN DOES 1-25,  
and ABC CORPORATIONS 1-25,

Case No. 07 CIV 5606 (JSR)

Defendants.

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Defendants, MARTIN N. KROLL ("Kroll") and KROLL, MOSS & KROLL,  
LLP (collectively the KMK Defendants), hereby make the following disclosures  
pursuant to F.R.C.P. 26(a)(3):

**A. WITNESSES**

1. The following person will testify:

Martin N. Kroll

**B. DEPOSITION TESTIMONY**

No deposition testimony will be used on case-in-chief.

**C. EXHIBITS**

1. Retainer dated August 30, 2001.
- 2.
3. Letter dated September 6, 2001, to Sheldon Eisenberg, Esq., from KMK, for return of materials.
4. Letter dated September 6, 2001, to Investor Recovery Service from KMK, for return of materials.
5. Letter dated October 16, 2001, to Prudential, from KMK, for return of materials.
6. Letter dated November 7, 2001, to Prudential, from KMK, transmitting authorization.
7. Letter dated October 2, 2001, to Secure Financial requesting analysis.
8. Letter dated November 1, 2001, to John Duval transmitting documents.
9. Letter dated November 6, 2001, to John Duval transmitting materials from T.D. Waterhouse.
10. Letter dated November 21, 2001, to John Duval transmitting Draft Statement of Claim.
11. Letter dated December 19, 2001, to John Duval transmitting revised Statement of Claim, Tolling Agreement and letter to Prudential.
12. Draft Statement of Claim.
13. Draft Tolling Agreement.
14. Letter dated January 8, 2002, to Prudential.
15. Letter dated January 28, 2002, requesting response from Prudential.
16. Letter dated February 20, 2002, to Gregory Candela at Prudential, regarding position.
17. Letter dated October 16, 2001, to Sahni requesting documents.
18. Letter dated November 26, 2001, to Sahni requesting documents.
19. Letter dated March 22, 2002, to Michael Clements transmitting Statement of Claim.
20. Letter dated March 26, 2002, to Sahni confirming settlement offer and rejection by Sahni.
21. Letter dated April 2, 2002, to Sahni urging legal fees.
22. Letter dated September 12, 2006, to Sahni, asserting our claim for fees.
23. Letter dated September 14, 2006, to Sahni, asserting our claim for fees.
24. Facsimile dated September 20, 2006, from Sahni advising of new counsel contact.
25. Letter dated September 25, 2006, to Sahni's counsel urging legal fees.

26. Letter dated October 13, 2006, making final demand on Sahni for payment of fees.

**DATED: Garden City, New York  
March 18, 2007**

**S/**  
**MARTIN N. KROLL (MK-1222)**  
**KROLL, MOSS & KROLL, LLP**  
**Defendants Pro Se**  
**400 Garden City Plaza**  
**Garden City, New York 11530**  
**516-873-8000**

**TO: RICHARD M. MALTZ, ESQ.**  
**FRANKFURT KURNIT KLEIN & SELZ PC**  
**Attorneys for ROBERT WEISS, ESQ. and ROBERT H. WEISS &**  
**ASSOCIATES, LLP**  
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**New York, New York 10022**

JKM/kh  
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